

ART ISSUE PAPER EXTENSION OF THE CALFED PROGRAM TO THE SUISUN MARSH LEVEES

Statement of Issue

To what extent should the Suisun Marsh levees be included in the levee program or the ERP? Some stakeholders and CALFED agencies (including California Department of Fish and Game) believe that the Suisun Marsh should be included in the Levee System Integrity Program. Other stakeholders, particularly Delta landowners and Reclamation District engineers, as well as other CALFED agencies, are concerned with doing so.

Background

The scope of the CALFED Levee System Integrity Program includes the legally defined Delta and approximately 12 miles of Suisun Marsh levees. The CALFED levee program has adopted the existing Delta levee program, authorized by AB 360, which includes 12 miles of levee within the Suisun Marsh as eligible for special-projects funding. The remainder of the exterior Suisun Marsh levees (approximately 230 miles), however, currently are not included in the AB 360 program or CALFED.

Ensuring exterior levee integrity in the Suisun Marsh is critical to sustaining seasonal wetland values provided by the Marsh's managed wetlands. Exterior levee integrity protects homes, club houses, roads, recreation sites, and State Water Project infrastructure. Improved levees would also ensure that conversion to tidal wetlands will not be due to levee failure, but instead, will be planned with consideration of landowner support, ERP targets, regional wetland goals, and endangered species recovery plans. Extending the program would provide key assurances to wetland managers in the Marsh.

There are four concerns about including the Suisun Marsh:

1. Link to CALFED Objectives: Suisun Marsh levees do not provide the same benefits as Delta levees to the CALFED objectives. For example, maintaining some Delta levees provides critical water quality benefits in the Delta. The water quality benefits to the CALFED Program resulting from Suisun Marsh levee integrity is not well known.
2. Competition for Funds: Expansion could result in the limited funding available to the Levee Program being diluted further and result in insufficient funding for the Delta itself. Delta stakeholders are generally opposed to any action that would diminish the available funding needed to protect the Delta's levees.

3. Coordination of Tidal and Seasonal Wetland Strategies: Funds could be expended unnecessarily because of future actions to restore tidal emergent wetlands and tidal perennial aquatic habitat to achieve ERP targets. In other words, it would be an inefficient use of public funds to maintain and rehabilitate any Suisun Marsh levees, which could be torn down a few years later. Levee work could interfere with achieving tidal wetlands restoration targets.
4. Partial Expansion of Levee Program: The scope of the proposed program expansion may be inadequate. If it only includes the Emergency Response portion of the program it could result in lost opportunities to make relatively minor repairs and maintenance that would avoid costly levee breaks in the future.

Options for Resolving Issue

Option 1: Expand Scope of Levee Program in the Suisun Marsh

Approve extension of selected elements of the Levee Program to the Suisun Marsh and include sufficient additional funding through the CALFED Levee Program to ensure no conflict with Delta needs.

Modified versions of the Base Level Protection Plan and Special Improvement Projects, and the Emergency Management Plan elements would be extended to the Marsh. The other components, Subsidence Control Plan and Seismic Risk Assessment, would not be. The PL-99 standard would not apply to the Marsh. An alternate standard, based on the existing levee criteria for the Suisun Marsh, would be selected to ensure that Marsh wetland managers would continue to be eligible for post disaster rehabilitation assistance. A separate funding sub-account would be established so that sufficient funding would be provided to implement this extension without diverting funds needed to support all components of the Levee Program in the Delta. Part of this option includes the development of a more refined description of this program component and a projected cost estimate.

Pros/Cons. Selecting this option ensures that the seasonal wetland implementation objectives and targets for the Suisun Marsh contained in the ERP would be met. This option could contribute to fostering support for CALFED from stakeholders in the Marsh. Selection will increase costs for the CALFED Program. Funding may be provided for levee work that may not be the highest priority for meeting CALFED objectives. Cost estimates for Suisun Marsh levee work are unknown at this time.

Option 2: Add Levee Protection Actions to ERP

Approve adding levee protection measures to the Suisun Marsh to be funded by the ERP. Include sufficient additional funding through the CALFED ERP so that the seasonal wetlands implementation objectives and targets in the ERP can be met.

Pros/Cons. Competition for funding will make it hard to set aside funding for the Suisun Marsh levees as part of the ecosystem program. The potential benefits to Delta water quality may not be realized if the effort is limited to the ecosystem program.

Option 3: Evaluate Benefits and Costs of Expanding Scope of Levee Program

Delay decision to expand Levee Program to the Marsh until selected information is obtained and brought back to management. A workgroup would be tasked to develop cost estimates for expanding the levee program and identify benefits to water quality and other Bay-Delta Program objectives.

Pros/Cons. Selecting this option could result in an eventual decision to extend the Levee Program at a point where the levee failures have occurred and the expense to repair is significant. Levee stability in the Marsh may not provide significant water quality benefits for Delta agricultural or exports and funding may be wasted on unnecessary research.

Option 4: Maintain Current CALFED Involvement in Suisun Marsh

Reject extension of the Levee Program to the Suisun Marsh. Funding for levees in Suisun Marsh may be provided under the ecosystem program. Funding would be allocated in competition with other ecosystem efforts.

Pros/Cons. Reduces the pressure on limited funds and maintains the focus on actions with a clear link to CALFED objectives. Puts at great risk the likelihood that the ERP implementation objectives and targets, for the seasonal wetlands, in the Marsh would be met. Marsh stakeholders may resist CALFED restoration efforts to restore tidal action to selected Marsh wetlands.

Recommended Options

- The DFG recommends Option 1 to the CALFED Management Team and Policy Group.
- Several other CALFED agencies were in support of either Option 3 or 4.